

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION**

BRUCE ERIKSON,	:	Case No. 1:23-CV-00066-MWM
	:	
Plaintiff,	:	Judge Matthew W. McFarland
v.	:	Magistrate Judge Stephanie K. Bowman
	:	
XAVIER UNIVERSITY, et al.,	:	JOINT MOTION TO MODIFY
	:	CALENDAR ORDER
Defendants.	:	

The parties, by and through undersigned counsel, hereby jointly request that this Court modify the current Calendar Order in order to extend the time to file expert disclosures and reports, complete discovery, and submit dispositive motions. On June 24, 2024, the Court entered an initial Calendar Order (Doc #24). On November 4, 2025 (Doc #27), the Court granted the Parties Joint Motion to Modify Calendar Order in part. Pursuant to the Calendar Order and subsequent modifications, the following are the current deadlines:

- Plaintiff's expert report(s): December 2, 2024
- Defendant's expert report(s): January 20, 2025
- Disclosure and report of rebuttal experts: February 21, 2025
- Discovery deadline: February 28, 2025
- Dispositive motions deadline: April 11, 2025

Despite working in good faith, the Parties agree that additional time is needed to complete discovery and request that the Court modify the existing schedule with the following new deadlines:

- Plaintiff's expert report(s): March 10, 2025
- Defendant's expert report(s): April 24, 2025
- Disclosure and report of rebuttal experts: May 23, 2025
- Discovery deadline: June 27, 2025
- Dispositive motions deadline: July 25, 2025

This request is not being made for the purpose of delaying this matter or prejudicing any party.

Respectfully submitted,

/s/ Marc D. Mezibov (per 1/28/25 email authorization)

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CERTIFICATE OF SERVICE

I hereby certify that on the 28th day of January 2025, a copy of the foregoing was filed electronically using the ECF System for the United States District Court for the Southern District of Ohio. Notice of this filing will be sent by operation of the Court's electronic filing system to all counsel of record registered on the ECF system.

/s/ Michelle A. Cheek

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